

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admissions *pro hac vice* pending)

***PROPOSED ATTORNEYS FOR DEBTOR***

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

**SHORT FORM APPLICATION TO ADMIT KATHLEEN A. FRAZIER *PRO HAC VICE***

**TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST**

**PLEASE TAKE NOTICE** that pursuant to Rule 2090-1 of the District of New Jersey Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, proposed co-counsel for Debtor, LTL Management LLC (the "Debtor"), hereby makes the application before the United States Bankruptcy Court for the District of New Jersey, for the entry of an Order admitting Kathleen A.

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Frazier of the law firm Shook, Hardy & Bacon, L.L.P. *pro hac vice* in the within proceeding to represent the Debtor.

The undersigned relies upon the Certification of Paul R. DeFilippo and the Order Allowing Kathleen A. Frazier to Appear as Proposed Co-Counsel for Debtor, *Pro Hac Vice* entered in the United States Bankruptcy Court for the District of New Jersey (Exhibit A),<sup>2</sup> in support of this application.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: April 27, 2023  
New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

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*Proposed Co-Counsel for LTL Management LLC*

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<sup>2</sup> On April 20, 2023, the Court entered a text order abrogating the requirement of attaching supporting documents in lieu of attaching the prior Order admitting the applicant *pro hac vice* in the Debtor's first bankruptcy case captioned *In re LTL Management LLC*, Case No. 21-30589. See <http://www.njb.uscourts.gov/LTL>.